

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KLEEN PRODUCTS LLC, et al.,
individually and on behalf of all those
similarly situated,

Plaintiffs,

v.

PACKAGING CORPORATION OF
AMERICA, et al.,

Defendants.

No. 1:10-cv-05711

Honorable Harry D. Leinenweber

ROCKTENN CP, LLC'S MOTION FOR LEAVE TO FILE UNDER SEAL

RockTenn CP, LLC ("RockTenn") submits this Motion seeking leave to file under seal Exhibit A to its Response to Plaintiffs' Supplemental Brief in Support of Plaintiffs' Motion to Compel Defendant RockTenn CP, LLC to Amend Its Privilege Log and Produce Certain Documents. In support of this Motion, RockTenn states as follows:

1. RockTenn intends to file its Response publicly and not under seal. Exhibit A to RockTenn's Response is RockTenn's Second Amended and Supplemental Privilege Log. This document has been designated as OUTSIDE ATTORNEYS EYES ONLY under the terms of the Protective Order entered in this case on August 15, 2011. In addition, this log contains sensitive information regarding documents subject to the attorney-client privilege and attorney work product protection.

2. Consistent with Local Rule 26.2, RockTenn will electronically file its Response publicly and will provisionally file Exhibit A electronically under seal, but will provide an unredacted version of all papers to counsel and the Court.

WHEREFORE, RockTenn respectfully requests leave to file Exhibit A to its Response to Plaintiffs' Supplemental Brief in Support of Plaintiffs' Motion to Compel Defendant RockTenn CP, LLC to Amend Its Privilege Log and Produce Certain Documents under seal.

Dated: March 5, 2014

Respectfully submitted,

/s/ Michael P. Mayer
One of the Attorneys for RockTenn CP, LLC

Michael P. Mayer
James F. Herbison
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, Illinois 60601
Telephone: (312) 558-5600
Facsimile: (312) 558-5700
mmayer@winston.com
jherbison@winston.com

Counsel for ROCKTENN CP, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of March, 2014, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all parties and counsel of record.

/s/ Michael P. Mayer